

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP
2120 L STREET, NW
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER

(202) 659-0830
FACSIMILE: (202) 828-5568

June 13, 2014

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

—
ARTHUR BLOOSTON
1914 – 1999

WRITER'S CONTACT INFORMATION

bhd@bloostonlaw.com
202-828-5510

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition,
GN Docket No. 12-353

Dear Ms. Dortch:

On Wednesday, June 11, 2014, John D. Knox, President, and John Chwat, Director of Government Relations, of the Electronic Security Association (“ESA”) met with Gigi Sohn, Special Counsel for External Affairs for Chairman Wheeler, and two other staff members from Chairman Wheeler’s office. The purpose of the meetings was to discuss issues in the above-referenced proceeding.

During the meetings, ESA spoke generally about its concerns regarding the TDM-to-IP transition as it relates to the alarm industry, including its perception of a growing monopoly over the communications pipelines that alarm companies rely upon to deliver their services to customers. A letter addressed to Chairman Wheeler and more fully describing these concerns is attached hereto, a copy of which was also distributed at the meeting.

ESA also provided general information about ESA itself, the Broadband Coalition, and its outreach efforts.

Please feel free to contact me with questions about this correspondence.

Sincerely,

/s/ Benjamin H. Dickens, Jr.

Benjamin H. Dickens, Jr.
Salvatore Taillefer, Jr.

CC: Gigi Sohn



June 11, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Wheeler:

As president of the Electronic Security Association, I represent the security industry's largest trade association with more than 2,500 member companies. On a personal note, I have been in the electronic security business since 1982 and a company owner since 1986. I service commercial and residential customers in a radius of 100 miles around Knoxville, Tennessee. Although our company is small (seven employees), we have never feared competition; in fact, it makes us better.

I am reaching out to you today because I see, in the near future, how the link to my customers and ESA members' customers could be in jeopardy. This will not only endanger our employees' livelihood but, most importantly, the life safety and security of our clients.

The threat that I see is the monopoly on the communication pipeline. Having worked with local phone exchanges and cellular sites for the past 30 years, I know how critical this pipeline is to alarm signals, e-mails, phone calls, and data – in fact, all wireless technology hinges on it and nothing gets from one person to another without copper or fiber wiring.

Today, however, I see the number of players who control the pipeline getting smaller. In fact, at my office in Knoxville, I have access to only one reliable way to obtain the quality of internet service I need.

I, along with most Americans, prefer less regulation with an equal right to compete for the business of the consumer. My concern is that a few communication giants will control the destiny of the pipeline and, as a result, will control the ability of small business owners to compete. I am asking you to install needed checks and balances to prevent price fixing, collusion, and unfair competition – practices of which monopolies have been guilty in the past.

I welcome the opportunity to communicate further with you and your office and thank you for your commitment to lead our communications industry.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Knox", is written over a horizontal line.

John D. Knox
ESA President